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2 THE BRINEGAR LAW FIRM  
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8 Attorney for Relator/Plaintiff

9 UNITED STATES DISTRICT COURT  
10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA AND STATE  
12 OF CALIFORNIA ex rel. GAIL JOSEPH, M.D.,

13 Plaintiff,

14 v.

15 P. GILL OBSTETRICS & GYNECOLOGY  
16 MEDICAL GROUP, INC., a California  
17 professional corporation; PARAMPAL K. GILL,  
18 M.D., an individual; JASBIR S. GILL, M.D., an  
19 individual,

20 Defendants.

Case No. 2:21-CV-00554-DAD-AC

**JOINT STATUS REPORT AND  
REQUEST FOR EXTENSION OF  
TIME**

1 Pursuant to the Court's January 9, 2024 Minute Order (ECF No. 53), the Parties notified  
2 the Court that they were diligently finalizing the terms of their settlement. Progress had been  
3 delayed while an appropriate figure for the private insurance claims was negotiated and submitted  
4 for approval to the Insurance Commission. The Parties advised that negotiations on the  
5 settlement figures were complete, but the Parties need an additional 30 days to memorialize and  
6 execute the final settlement agreement. (ECF No. 54.)  
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8 The Court ordered that the Parties file dispositional documents by February 26, 2024.  
9 (ECF No. 54.) Prior to last week, counsel for the United States had circulated draft language for  
10 an agreement to settle the claims under the False Claims Act and California False Claims Act, and  
11 the Relator and the Defendants had exchanged a draft and proposed edits for a separate document  
12 to that related to any other amounts Relator claims are due to her. But recently, there have been  
13 delays outside the Parties' control. First, Relator's counsel, a sole practitioner, has been in trial in  
14 Monterey Superior Court and, thus, substantially unavailable. But even if Relator's counsel and  
15 Defendants' counsel were to work weekends and nights around the trial to finalize the  
16 dispositional documents, it would not have made a difference. Counsel for the Attorney General  
17 has advised that a supervisor in her office recently died, and as a result, she advises that the State  
18 supports the Parties' request for an extension of time for the filing of final dispositional papers to  
19 March 28, 2024. That should provide sufficient time for the Parties' language to be approved all  
20 the way up the line of reporting and approval.  
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23 Undersigned Relator's counsel has every interest in finalizing the settlement and receiving  
24 funds and has no concern that any Party has been intentionally dilatory.

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Dated: February 25, 2024

Respectfully submitted,

THE BRINEGAR LAW FIRM

By: /s/ Matthew A. Brinegar  
MATTHEW BRINEGAR  
Attorneys for Relator/Plaintiff  
Gail Joseph, M.D.

Dated: February 25, 2024

STOEL RIVES LLP

By: /s/ Matthew D. Segal  
MATTHEW D. SEGAL  
WHITNEY A. BROWN  
Attorneys for Defendants  
P. Gill Obstetrics & Gynecology Medical  
Group, Inc.; Parampal K. Gill, M.D.;  
Jasbir S. Gill, M.D.

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on the 25th day of February 2024, I caused to be electronically filed  
3 and served the foregoing with the Clerk of the Court using the CM/ECF system, which will send  
4 notification of such filing to the following:

5 Matthew Segal, Esq.  
6 STOEL RIVES LLP  
7 500 Capitol Mall, Suite 1600  
8 Sacramento, CA 95814  
9 [matthew.segal@stoel.com](mailto:matthew.segal@stoel.com)

10 Dated: February 25, 2024

THE BRINEGAR LAW FIRM

11 By: /s/ Matthew Brinegar  
12 MATTHEW BRINEGAR  
13 Attorneys for Relator/Plaintiff  
14 Gail Joseph, M.D.  
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